

EXHIBIT 4

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3 UNITED STATES DISTRICT COURT

4 DISTRICT OF MASSACHUSETTS

5 No. 04-CV-11948-RGS

6 SEYED MOHSEN HOSSEINI-SEDEHY,

7 Plaintiff

8 vs.

9 ERIN T. WITHTINGTON and the CITY

10 OF BOSTON,

11 Defendants

12
13 DEPOSITION OF ERIN T. WITHTINGTON

14 Thursday, March 31, 2005

15 10:00 a.m. - 4:32 p.m.

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24 Reporter: Cynthia C. Henderson/RPR

Erin T. Withington - March 31, 2005

<p>1 complaint?</p> <p>2 A. No, I did not.</p> <p>3 Q. So he volunteered the name Perry?</p> <p>4 A. Yes.</p> <p>5 Q. Did he use the term "BS" or was he more explicit?</p> <p>7 A. He was more explicit.</p> <p>8 Q. He used a swear instead of using the term BS?</p> <p>10 A. Yes, he did.</p> <p>11 Q. After you tried contacting GES to get Hosseini's name and phone number and a contact number, you then indicated that the next action you took in this investigation was to call back Joseph Bavis?</p> <p>16 A. Yes.</p> <p>17 Q. And the purpose of calling back Joseph Bavis was to identify Mr. Hosseini and get a contact number?</p> <p>20 A. I was trying to find somebody who would be cooperative, did they have someone else that would give me this information that was cooperative and wasn't so rude, and he gave me -- I can't remember the person's name. It's in my reports. He gave me</p>	<p>22</p> <p>1 given for Mr. Hosseini, and his voice mail does say, 2 "You have reached Mr. Hosseini." I left him a 3 message that there were allegations being made 4 against him, I would like to speak with him if he 5 would like to speak with me, and left him my phone 6 number.</p> <p>7 Q. Do you remember if Mr. Hosseini called you before you went out on disability?</p> <p>9 A. I don't remember, but I don't believe he had. I think he was away. I don't believe he did.</p> <p>11 Q. Was there any other action you took with respect to this investigation before you went out on disability on January 7th, 2004?</p> <p>14 A. I did speak with the attorney at the Hynes Convention Center to let them know that there was an investigation, that an allegation had occurred within the Hynes, but that didn't include, it didn't have anything to do with the Hynes itself, that something had occurred there, and they just asked me if I needed anything from them or if it came to a point where the Hynes Convention Center might be named as any type of party to this; if I could let them know. I said I would, and I just wanted them to know that I would be in and out of the building</p>
<p>1 another name and cell phone number, and I called that person.</p> <p>3 Q. A guy by the name of Dodd?</p> <p>4 A. I believe his name is Henry or Sam.</p> <p>5 Q. In one of our reports you have a Mr. Dodd.</p> <p>7 A. Yes.</p> <p>8 Q. Does that name ring a bell?</p> <p>9 A. It does. I believe he told me his first name. I am not a hundred percent sure.</p> <p>11 Q. And did you speak with this person that may have been Mr. Dodd in person or on the telephone?</p> <p>13 A. On the telephone.</p> <p>14 Q. And what information did you receive from Mr. Dodd during that telephone conversation?</p> <p>16 A. I explained to him that I just needed to know Mr. Hosseini's name and a way to get in touch with him. He gave me his full name and he told me that -- he gave me his cell phone and he told me he thought he lived in Charlestown.</p> <p>21 Q. After speaking with Mr. Dodd, what was the next action you took with respect to this investigation?</p> <p>24 A. I then called the telephone number I was</p>	<p>23</p> <p>1 and not to be surprised about that.</p> <p>2 Q. What information did you receive from this Hynes Convention Center attorney?</p> <p>4 A. I didn't really receive any information. I was letting him know that there was an investigation going on and that I didn't tell them what it was about, but there was an incident that had occurred, that I would be in and out, that the Boston police would be at the Hynes Convention Center.</p> <p>10 Q. Do you remember if you did anything else with respect to this investigation before you went out on disability other than what you have just told us?</p> <p>14 A. No, I don't believe I did.</p> <p>15 Q. Now, you indicated that you came back to work in March, did you?</p> <p>17 A. Yes.</p> <p>18 Q. And what date did you come back to work?</p> <p>19 A. I want to say March 7th or 8th.</p> <p>20 Q. When you got back to work do you know if any other detective had done any investigation on this case, these allegations, while you were on leave, disability leave?</p> <p>24 A. No, they did not.</p>